

BEFORE THE
FEDERAL COMMUNICATION COMMISSION
WASHINGTON, D.C. 20554

In the Matter of)	
)	
Innovation in the Broadcast Television Bands:)	
Allocations, Channel Sharing and Improvements)	ET Docket No. 10-235
to VHF)	
To: The Commission		

COMMENTS

Khanna & Guill, Inc. - Consulting Engineers, hereby submits its comments in response to the Notice of Proposed Rulemaking (“NPRM”) in the above referenced proceeding concerning the Commission’s proposals to repurpose up to 120 megahertz of spectrum from the broadcast television bands for new wireless broadband services and provide improvements to VHF television service.

The principals of the firm of Khanna & Guill, Inc. have been providing consulting engineering services to the radio-television broadcast industry for more than 38 years.

These comments are made particularly with regard to the technical aspects of the proposals listed in the NPRM.

Broadcast Television Channel Sharing

The National Broadband Plan envisions re-purposing of up to 120 MHz spectrum (20 TV channels) from the broadcast television bands for new wireless services. It is reasonable to

assume that wireless services would prefer contiguous higher portion of the UHF band rather than VHF television spectrum since it is closer to the current 700 MHz band used for such services. Many television stations also prefer the UHF band due to potential of providing mobile TV services.

At present there are 37 TV channels available for television broadcasting in the UHF band. If 20 TV channels are reclaimed by the Commission for wireless services that would leave only 17 TV channels for UHF television broadcasting. It appears 17 UHF television channels may not be sufficient to share between currently licensed TV stations, Class A TV and low power TV stations, particularly those stations located in the Zone 1 area. For example, in the New York City area, there are currently 10 TV stations, 4 Class A TV and 9 low power TV stations operate in the UHF band. In addition, in New York, TV channels 14, 15 and 16 are allotted for Land Mobile stations. Similarly, in the Philadelphia, Pennsylvania area there are 11 TV stations, 3 Class A TV and 7 low power TV stations located in the UHF band. In the Baltimore, Maryland area there 5 TV stations and 4 low power TV stations operate in the UHF TV band. In the Washington, DC area there are 10 TV stations, 4 Class A TV and 2 low power TV stations operate in the UHF band. Philadelphia is located approximately 133 km from New York and approximately 143 km from Baltimore. Washington DC is located approximately 56 km from Baltimore, Maryland.

According to Section 73.623(d) of the Commission's rules a minimum of 196.3 km separation is required for new co-channel DTV allotments. This rule implies that less than 196.3 km separation has a potential for causing interference to TV stations that operate on co-channels.

There are additional restrictions on the use of adjacent channels. TV stations cannot operate on adjacent channels in a market unless their transmitter sites are located close to each other and they operate with similar ERP, antenna heights and pattern circularity.

Due to the proximity of New York/ Philadelphia/Baltimore/Washington DC to each other, there may not be sufficient spectrum available to accommodate the current TV stations, Class A TV and low power TV stations that operate in the UHF band with channel sharing. There may be other communities, especially within the Zone 1 area, where 17 UHF channels may not be sufficient to permit all TV operations to share. Therefore we believe only limited UHF spectrum for wireless services should be reclaimed after ensuring that all current UHF TV stations in the UHF band continue to operate with or without sharing a channel.

Under the Community Broadcasters Protection Act of 1999, the US Congress has directed the Commission to establish 175 additional channels for new TV stations. The scarcity of spectrum may preclude additional new TV stations on UHF channels, particularly within the Zone 1 area.

The Commission should be aware that sharing of TV channels would require re-tuning or possibly re-design of TV receivers. This can further result in confusion for the general public who are using a converter box and have gone through re-tuning of their analog TV receivers in 2009.

Consideration of Service Losses

We recommend the Commission to continue its current policy of evaluating any public service losses and gains on a case-by-case basis when determining whether to permit channel

sharing. Since there would be several factors involved, e.g., first or second television service, first network service, any gain and loss of area etc., a strict review standard may not be feasible. Reviewing of proposals on case-by-case basis would allow the Commission to evaluate all possible factors in the public interest.

Improving Reception of VHF TV Service

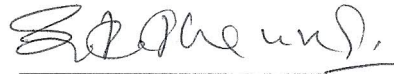
We support the Commission's proposal to increase the maximum allowed effective radiated power (ERP) for VHF stations located in Zone 1. Some of our clients have informed us about the difficulty of replicating the analog TV service with the digital television operation particularly on low VHF bands. TV stations on low VHF bands are having problem providing digital TV service in some areas where less than perfect (e.g. weak/noisy) picture was available through analog TV broadcasting. Additional power would help mitigate impulse noise and poor receive antenna gain factor and help improve service in the VHF bands.

We urge the Commission to consider also an increase in the maximum ERP for Class A TV and low power TV stations located in the Zone 1 area.

We also support the Commission's proposal to set the minimum gain standards for receive antennas. Currently many receive antennas are sold based on claims of certain range of service from the transmitter site rather than actual gain of the antenna in the major lobe. Requirement of minimum standard would result in a uniform standard by which general public would be able to compare different antennas. Such requirement may also stimulate the design and development of better antennas.

Respectfully submitted,

Khanna & Guill, Inc.

A handwritten signature in dark ink, appearing to read 'S. K. Khanna', written over a horizontal line.

S. K. Khanna, P.E.

Robert W. Guill

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March 17, 2011

TV, CLASS A TV AND LOW POWER TV STATIONS
OPERATING ON UHF CHANNELS
WITHIN APPROXIMATELY 50 KM
FROM THE CENTER OF EACH COMMUNITY
March 2011

NEW YORK, NEW YORK

WLG-LD	17	LD	LIC	MORRISTOWN		NJ US	BLDTL-
20080221ABE	-		<u>74513</u>	1. kW	0. m	43.83 km	27.24
mi 275.11° WLNY LIMITED PARTNERSHIP							

<u>WEBR-CD</u>	17	DC	LIC	MANHATTAN		NY US	BLDTA-20090831ACL
-	<u>67866</u>		0.315 kW	0. m	0.77 km	0.48 mi	118.64° K LICENSEE, INC.

<u>WMBC-TV</u>	18	DT	LIC	NEWTON		NJ US	BLCDDT-20060803AMO
-	<u>43952</u>		1000. kW	250. m	21.49 km	13.35 mi	305.92° MOUNTAIN BROADCASTING CORPORATION

<u>WLIW</u>	21	DT	LIC	GARDEN CITY		NY US	BLEDT-20090612AEP
-	<u>38336</u>		89.9 kW	111. m	45.92 km	28.53 mi	84.68° WNET.ORG

<u>WDVB-LD</u>	23	LD	LIC	EDISON		NJ US	BLDTL-20110113ABM
-	<u>168834</u>		7. kW	0. m	0.77 km	0.48 mi	118.64° DEEPAK VISWANATH

<u>WNYE-TV</u>	24	DT	LIC	NEW YORK		NY US	BLEDT-20071228ABM
-	<u>6048</u>		151. kW	309.7 m	0.80 km	0.50 mi	51.96° NEW YORK CITY DEPT. OF INFO TECHNOLOGY & TELECOMMUNICATIONS

<u>WASA-LD</u>	25	LD	LIC	PORT JERVIS		NY US	BLDTL-20091222AQB
-	<u>167320</u>		15. kW	0. m	0.80 km	0.50 mi	51.96° KRCA LICENSE LLC

<u>WLNY-CD</u>	26	LD	LIC	MINEOLA		NY US	BLDTL-20071217ACU
-	<u>73207</u>		1. kW	0. m	35.11 km	21.82 mi	96.30° WLNY LIMITED PARTNERSHIP

<u>W26DC</u>	26 Z	TX	LIC	HEMPSTEAD		NY US	BLTTL-20080522ABK
-	<u>49882</u>		13.7 kW	0. m	45.92 km	28.53 mi	84.68° K LICENSEE, INC.

<u>WRNN-LD</u>	26	LD	LIC	NEW YORK		NY US	BLDTL-20091123AAX
-	<u>38945</u>		0.6 kW	0. m	4.27 km	2.66 mi	96.64° RICHARD D. BOGNER

<u>WFME-TV</u>	29	DT	LIC	WEST MILFORD		NJ US	BLEDT-20040712ACP
-	<u>20818</u>		200. kW	167. m	22.42 km	13.93 mi	280.59° FAMILY STATIONS OF NEW JERSEY, INC.

<u>WFUT-DT</u>	30	DT	LIC	NEWARK		NJ US	BLCDDT-20090618ABZ
-	<u>60555</u>		200. kW	429. m	0.77 km	0.48 mi	118.64° UNIVISION NEW YORK LLC

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<u>WFUT-DT</u>	30	DX	LIC	NEWARK		NJ US	BXLCDT-20101222AAI
-	<u>60555</u>		80. kW	309. m	0.80 km	0.50 mi	51.96° UNIVISION NEW YORK LLC
<u>W32DF</u>	32 +	TX	LIC	HEMPSTEAD		NY US	BLTTTL-20090522AEX
-	<u>155</u>		3.3 kW	0. m	37.77 km	23.47 mi	88.73° 7THDAY ADVENTIST COMMUNITY HEALTH SERV. OF GTR. NY
<u>WXNY-LD</u>	32	LD	LIC	NEW YORK		NY US	BLDTL-20090908ACO
-	<u>29231</u>		7.5 kW	0. m	4.27 km	2.66 mi	96.64° ISLAND BROADCASTING COMPANY
<u>WCBS-TV</u>	33	DT	LIC	NEW YORK		NY US	BLCDT-20090612AFN
-	<u>9610</u>		284. kW	397. m	0.77 km	0.48 mi	118.64° CBS BROADCASTING INC.
<u>WPXO-LD</u>	34	LD	LIC	EAST ORANGE		NJ US	BLDTL-20090511AYH
-	<u>14311</u>		3.5 kW	0. m	0.77 km	0.48 mi	118.64° AMERICA-CV STATION GROUP, INC.
<u>WNYX-LD</u>	35	LD	LIC	NEW YORK		NY US	BLDTL-20090908ACQ
-	<u>29236</u>		10. kW	0. m	4.27 km	2.66 mi	96.64° ISLAND BROADCASTING COMPANY
<u>WNJU</u>	36	DT	LIC	LINDEN		NJ US	BLCDT-20080514ADL
-	<u>73333</u>		650. kW	223.4 m	22.04 km	13.70 mi	284.89° NBC TELEMUNDO LICENSE, LLC
<u>WPXU-LP</u>	38 Z	TX	LIC	AMITYVILLE		NY US	BLTTTL-19960422KA
-	<u>2129</u>		12.6 kW	0. m	31.21 km	19.39 mi	91.07° ION MEDIA LPTV, INC.
<u>WDVB-CA</u>	39 -	TX	LIC	EDISON		NJ US	BLTTTL-20041221ABN
-	<u>16389</u>		50. kW	0. m	41.80 km	25.98 mi	233.79° DEEPAK VISWANATH
<u>WNYN-LD</u>	39	LD	LIC	NEW YORK		NY US	BLDTL-20090619AAO
-	<u>74305</u>		3. kW	0. m	4.27 km	2.66 mi	96.64° TVC NY LICENSE LLC
<u>WXTV-DT</u>	40	DT	LIC	PATERSON		NJ US	BLCDT-20050214AGS
-	<u>74215</u>		300. kW	421. m	0.77 km	0.48 mi	118.64° WXTV LICENSE PARTNERSHIP, G.P.
<u>W41DO-D</u>	41	LD	LIC	NEW YORK		NY US	BLDTL-20110224ACL
-	<u>60554</u>		3.25 kW	0. m	2.44 km	1.51 mi	62.91° VENTANA TELEVISION, INC.
<u>WNXY-LD</u>	43	LD	LIC	NEW YORK		NY US	BLDTL-20100901AAD
-	<u>29233</u>		4. kW	0. m	4.27 km	2.66 mi	96.64° ISLAND BROADCASTING COMPANY
<u>WNYW</u>	44	DT	LIC	NEW YORK		NY US	BLCDT-19990826KF
-	<u>22206</u>		246. kW	367. m	0.77 km	0.48 mi	118.64° FOX TELEVISION STATIONS, INC.

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WLNY-CD	45	DC	LIC	MINEOLA		NY US	BLDTA-20100803AAC
-	73207		15. kW	0. m	2.23 km	1.39 mi	88.40° WLNY LIMITED PARTNERSHIP

WMBQ-CA	46	CA	LIC	NEW YORK		NY US	BLTTA-20090709AIR
-	14322		59.3 kW	0. m	2.25 km	1.40 mi	88.42° RENARD COMMUNICATIONS CORP.

WNJN	51	DT	LIC	MONTCLAIR		NJ US	BLEDT-20061121ADG
-	48477		200. kW	233. m	21.49 km	13.35 mi	305.92° NEW JERSEY PUBLIC BROADCASTING AUTHORITY

PHILADELPHIA, PENNSYLVANIA

WTSD-CA	14	CA	LIC	WILMINGTON		DE US	BLTTA-20041206AAM
-	53579		150. kW	0. m	12.34 km	7.67 mi	326.24° PRIORITY COMMUNICATIONS MINISTRIES, INC.

WPHL-TV	17	DT	LIC	PHILADELPHIA		PA US	BLCDDT-20090918ABV
-	73879		645. kW	324. m	12.50 km	7.77 mi	325.16° TRIBUNE TELEVISION COMPANY, DEBTOR-IN-POSSESSION

WNJS	22	DT	LIC	CAMDEN		NJ US	BLEDT-20070611AAY
-	48481		197. kW	264. m	36.28 km	22.54 mi	132.67° NEW JERSEY PUBLIC BROADCASTING AUTHORITY

WTVE	25	DT	LIC	READING		PA US	BLCDDT-20081117ADZ
-	55305		126. kW	378.4 m	12.35 km	7.67 mi	326.03° WTVE LICENSE COMPANY, LLC

WGTW-TV	27	DT	LIC	BURLINGTON		NJ US	BLCDDT-20060105AAR
-	7623		160. kW	354. m	12.34 km	7.67 mi	326.24° TCCSA, INC., D/B/A TRINITY BROADCASTING NETWORK

WFPA-CA	28	CA	LIC	PHILADELPHIA		PA US	BLTTTL-20000428ABK
-	74216		10.9 kW	0. m	12.13 km	7.54 mi	325.32° WXTV LICENSE PARTNERSHIP, G.P.

WUVP-DT	29	DT	LIC	VINELAND		NJ US	BLCDDT-20090923ADS
-	60560		335. kW	398. m	12.34 km	7.67 mi	326.24° UNIVISION PHILADELPHIA LLC

WELL-LD	30	LD	LIC	PHILADELPHIA		PA US	BLDTL-20100208AAC
-	167028		10. kW	0. m	12.10 km	7.52 mi	325.06° WORD OF GOD FELLOWSHIP, INC.

WPPX-TV	31	DT	LIC	WILMINGTON		DE US	BLCDDT-20031203AFL
-	51984		200. kW	374. m	12.34 km	7.67 mi	326.24° ION MEDIA PHILADELPHIA LICENSE, INC.

WPSG	32	DT	LIC	PHILADELPHIA		PA US	BLCDDT-20021025AAS
-	12499		250. kW	400. m	12.34 km	7.67 mi	326.24° PHILADELPHIA TELEVISION STATION WPSG, INC.

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WZPA-LP	33	Z	TX	LIC	PHILADELPHIA	PA	US	BLTTL-20070223AGT
-	72536			150. kW	0. m	12.33 km	7.66 mi	326.16° MAKO
COMMUNICATIONS, LLC								

WYBE	34	DT		LIC	PHILADELPHIA	PA	US	BLEDT-20030213AAD
-	28480			500. kW	343. m	12.34 km	7.67 mi	326.24° INDEPENDENCE
PUBLIC MEDIA OF PHILADELPHIA, INC.								

W36DO-D	36	LD		LIC	DARBY	PA	US	BLDTL-20081125AJT
-	72535			3.8 kW	0. m	12.33 km	7.66 mi	326.16° MAKO
COMMUNICATIONS, LLC								

WPHA-CD	38	DC		LIC	PHILADELPHIA	PA	US	BLDTA-20101118AIV
-	72278			3. kW	0. m	12.10 km	7.52 mi	325.06° D.T.V. LLC

WQAV-LD	39	LD		LIC	ATLANTIC CITY	NJ	US	BLDTL-20100113ADM
-	168064			15. kW	0. m	35.95 km	22.34 mi	131.55° ASIAVISION, INC.

WWDD-LP	40	-	TX	LIC	WILMINGTON	DE	US	BLTT-19931117JC
-	47692			10.3 kW	0. m	31.20 km	19.39 mi	248.76° WORD OF GOD FELLOWSHIP, INC

WNAI-LP	41	Z	TX	LIC	SPRINGVILLE	NJ	US	BLTTL-20041117ACS
-	19586			140. kW	0. m	12.34 km	7.67 mi	326.24° MARCIA COHEN

WTXF-TV	42	DT		LIC	PHILADELPHIA	PA	US	BLCDDT-20090615AAE
-	51568			260. kW	343. m	12.34 km	7.67 mi	325.19° FOX TELEVISION STATIONS, INC.

WMCN-TV	44	DT		LIC	ATLANTIC CITY	NJ	US	BLCDDT-20060707ACS
-	9739			200. kW	212. m	36.28 km	22.54 mi	132.67° LENFEST BROADCASTING, LLC

WPSJ-LD	51	LD		LIC	HAMMONTON	NJ	US	BLDTL-20100706AKA
-	167543			15. kW	0. m	36.28 km	22.54 mi	132.67° ENGLE BROADCASTING

WCAU	67	DT		LIC	PHILADELPHIA	PA	US	BLCDDT-20040112ACE
-	63153			560. kW	377. m	12.34 km	7.67 mi	326.24° NBC TELEMUNDO LICENSE, LLC

BALTIMORE, MARYLAND

WMJF-LP	16	Z	TX	LIC	TOWSON	MD	US	BLTTL-
20001204AAA	-			67462	1.22 kW	0. m	11.69 km	7.27 mi
1.87° TOWSON								

WMJF-LP	16	CA		LIC	TOWSON	MD	US	BLTTA-20050909ADB
-	67462			3.5 kW	0. m	11.69 km	7.27 mi	1.87° TOWSON

WMPB	29	DT		LIC	BALTIMORE	MD	US	BLEDT-20090330AEX
-	65944			42.6 kW	309. m	22.60 km	14.04 mi	320.48° MARYLAND PUBLIC BROADCASTING COMMISSION

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WRZB-LP	31	-	TX	LIC	ANNAPOLIS	MD	US	BLTTTL-20070907AFY
-	56826			67.6 kW	0. m	34.09 km	21.18 mi	171.39° DC
BROADCASTING, INC.								
WJZ-TV	38		DT	LIC	BALTIMORE	MD	US	BLCDDT-20050128AKU
-	25455			1000. kW	312. m	5.91 km	3.67 mi	326.13° CBS
CORPORATION								
WJZ-TV	38		DX	LIC	BALTIMORE	MD	US	BXLCDT-20070117AAA
-	25455			306. kW	283. m	5.91 km	3.67 mi	326.13° CBS
CORPORATION								
WMAR-TV	38		DT	LIC	BALTIMORE	MD	US	BLCDDT-20090619ACA
-	59442			1000. kW	312. m	5.91 km	3.67 mi	326.13° SCRIPPS
MEDIA, INC.								
WNUV	40		DT	LIC	BALTIMORE	MD	US	BLCDDT-20051011AOI
-	7933			845. kW	372.8 m	5.99 km	3.72 mi	327.71° BALTIMORE
(WNUV-TV) LICENSEE, INC.								
WUTB	41		DT	LIC	BALTIMORE	MD	US	BLCDDT-20080528AAR
-	60552			200. kW	308. m	12.78 km	7.94 mi	268.52° FOX
TELEVISION STATIONS, INC.								
WMPT	42		DT	LIC	ANNAPOLIS	MD	US	BLEDT-20030903ABC
-	65942			150. kW	289. m	31.15 km	19.35 mi	179.47° MARYLAND
PUBLIC BROADCASTING COMMISSION								
W45DN-D	45		LD	LIC	WASHINGTON	DC	US	BLDTL-20110201ACL
-	125165			15. kW	0. m	42.50 km	26.41 mi	175.56° EICB-TV EAST,
LLC								
WIAV-LP	58	+	TX	LIC	WASHINGTON	DC	US	BLTTTL-19940825IK
-	2962			35. kW	0. m	40.44 km	25.13 mi	214.77° ASIAVISION,
INC.								
W63BO	63	+	TX	LIC	BALTIMORE	MD	US	BLTTTL-19961024JA
-	21700			6.92 kW	0. m	0.23 km	0.14 mi	227.30° INFORMATION
SUPER STATION, L.L.C.								
WQAW-LP	69	+	TX	LIC	LAKE SHORE	MD	US	BLTTTL-20070302ABL
-	131071			39.8 kW	0. m	47.17 km	29.31 mi	139.56° UNA VEZ MAS
LAKE SHORE LICENSE, LLC								

WASHINGTON DC

WFDC-DT	15		DT	LIC	ARLINGTON	VA	US	BLCDDT-
20070215AAB	-			69532	325. kW	173. m	7.86 km	4.88
mi 307.02° TELEFUTURA D.C. LLC								
WDDN-LD	22		LD	LIC	WASHINGTON	DC	US	BLDTL-20110215ACJ
-	167016			10. kW	0. m	12.12 km	7.53 mi	339.98° WORD OF GOD
FELLOWSHIP, INC.								

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<u>WDDN-LP</u>	23	- TX	LIC	WASHINGTON	DC US	BLTTL-20080327AAI
- <u>12667</u>			150. kW	0. m 12.12 km	7.53 mi	339.98° WORD OF GOD FELLOWSHIP, INC.
<u>WNVC</u>	24	DT	LIC	FAIRFAX	VA US	BLEDT-20090612ACS
- <u>9999</u>			160. kW	221.1 m 18.76 km	11.66 mi	262.19° COMMONWEALTH PUBLIC BROADCASTING CORPORATION
<u>WZDC-CA</u>	25	CA	LIC	WASHINGTON	DC US	BLTTL-20070309ADR
- <u>50347</u>			29. kW	0. m 7.86 km	4.88 mi	306.94° ONDA CAPITAL, INC.
<u>WETA-TV</u>	27	DT	LIC	WASHINGTON	DC US	BLEDT-20070727ACJ
- <u>65670</u>			90. kW	254. m 8.47 km	5.26 mi	313.90° GREATER WASHINGTON EDUCATIONAL TELECOMMUNICATIONS
<u>WFPT</u>	28	DT	LIC	FREDERICK	MD US	BLEDT-20090330AFA
- <u>40626</u>			41.2 kW	158. m 48.06 km	29.86 mi	327.13° MARYLAND PUBLIC BROADCASTING COMMISSION
<u>WNVF</u>	30	DT	LIC	GOLDVEIN	VA US	BLEDT-20031230AAR
- <u>10019</u>			160. kW	229. m 47.83 km	29.72 mi	231.41° COMMONWEALTH PUBLIC BROADCASTING CORPORATION
<u>WRZB-LP</u>	31	- TX	LIC	ANNAPOLIS	MD US	BLTTL-20070907AFY
- <u>56826</u>			67.6 kW	0. m 40.75 km	25.32 mi	75.70° DC BROADCASTING, INC.
<u>WHUT-TV</u>	33	DT	LIC	WASHINGTON	DC US	BLEDT-20071018AIJ
- <u>27772</u>			100. kW	254. m 8.47 km	5.26 mi	313.90° HOWARD UNIVERSITY
<u>WTTG</u>	36	DT	LIC	WASHINGTON	DC US	BLCDT-19991013AAB
- <u>22207</u>			1000. kW	201. m 9.13 km	5.67 mi	315.58° FOX TELEVISION STATIONS, INC.
<u>WUTB</u>	41	DT	LIC	BALTIMORE	MD US	BLCDT-20080528AAR
- <u>60552</u>			200. kW	308. m 48.34 km	30.04 mi	26.25° FOX TELEVISION STATIONS, INC.
<u>WMPT</u>	42	DT	LIC	ANNAPOLIS	MD US	BLEDT-20030903ABC
- <u>65942</u>			150. kW	289. m 36.85 km	22.90 mi	69.99° MARYLAND PUBLIC BROADCASTING COMMISSION
<u>WPXW-TV</u>	43	DT	LIC	MANASSAS	VA US	BLCDT-20010425ABG
- <u>74091</u>			90. kW	190. m 30.38 km	18.88 mi	246.38° ION MEDIA WASHINGTON LICENSE, INC.
<u>W45DN-D</u>	45	LD	LIC	WASHINGTON	DC US	BLDTL-20110201ACL
- <u>125165</u>			15. kW	0. m 37.73 km	23.45 mi	87.94° EICB-TV EAST, LLC
<u>WMDO-CA</u>	47	CA	LIC	WASHINGTON	DC US	BLTTA-20080428AAQ
- <u>38437</u>			16.5 kW	0. m 7.86 km	4.88 mi	307.02° ENTRAVISION HOLDINGS, LLC

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WRC-TV 48 DT LIC WASHINGTON DC US BLCDT-20000216AAT
- 47904 813. kW 242. m 7.86 km 4.88 mi 307.02° NBC TELEMUNDO
 LICENSE, LLC

WWTD-LP 49 Z TX LIC WASHINGTON DC US BLTTL-20060711ABI
- 56825 150. kW 0. m 7.86 km 4.88 mi 307.02° DC
 BROADCASTING, INC.

WDCW 51 DT LIC WASHINGTON DC US BLCDT-20030221AAG
- 30576 125. kW 252.5 m 7.34 km 4.56 mi 348.13° WDCW
 BROADCASTING, INC., DEBTOR-IN-POSSESSION

WIAV-LP 58 + TX LIC WASHINGTON DC US BLTTL-19940825IK
- 2962 35. kW 0. m 15.33 km